

FILED

JAN 19 2022

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

JESSICA MORGAN FELDER and
DAQUAN E'MON HUNT,

Defendants.

Criminal No. 3:22-CR-7

Violations: 18 U.S.C. § 2
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement During Purchase of a Firearm)

On or about May 13, 2021, in Berkeley County, in the Northern District of West Virginia, defendant **JESSICA MORGAN FELDER**, in connection with the acquisition of a firearm, that is a Sig Sauer, Model P365, 9mm pistol, bearing serial number 66B477109, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **JESSICA MORGAN FELDER** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(False Statements During Purchase of a Firearm)

On or about May 14, 2021, in Morgan County, in the Northern District of West Virginia, defendant **JESSICA MORGAN FELDER**, in connection with the acquisition of a firearm, that is a Smith and Wesson, Model SD40, .40 caliber pistol, bearing serial number FDH3475, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **JESSICA MORGAN FELDER** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(False Statement During Attempted Purchase of a Firearm)

On or about May 14, 2021, subsequent to the events in Count Two, in Morgan County, in the Northern District of West Virginia, defendant **JESSICA MORGAN FELDER**, in connection with the attempted acquisition of a firearm, that is a Glock, Model 23, .40 caliber pistol, bearing serial number SWY944, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **JESSICA MORGAN FELDER** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

(Aiding and Abetting False Statement During Purchase of a Firearm)

On or about July 3, 2021, in Berkeley County, in the Northern District of West Virginia, defendant **JESSICA MORGAN FELDER**, aided and abetted by defendant **DAQUAN E'MON HUNT**, in connection with the acquisition of a firearm, that is a SCCY, CPX-2, 9mm pistol, bearing serial number C173685, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **JESSICA MORGAN FELDER** under chapter 44 of Title 18, in that the defendant represented that she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm and defendant **DAQUAN E'MON HUNT** was the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including: a Sig Sauer, Model P365, 9mm pistol, bearing serial number 66B477109; a Smith and Wesson, Model SD40, .40 caliber pistol, bearing serial number FDH3475; a SCCY, CPX-2, 9mm pistol, bearing serial number C173685; and assorted ammunition.

A True Bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM J. IHLENFELD, II
United States Attorney

Lara K. Ombs-Botteicher
Assistant United States Attorney